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Counsel for Defendant  
 ALIREZA MOHEB

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	No. CR 22-00132 JSW
	)	
Plaintiff,	)	<b>DECLARATION OF ALIREZA</b>
	)	<b>MOHEB</b>
v.	)	
	)	
ALIREZA MOHEB,	)	Date: October 3, 2023
	)	Time: 1:00 p.m.
Defendant.	)	Hon. Jeffrey S. WHITE

I, Alireza Moheb, make the following declaration to assist the Court in fashioning an appropriate sentence in this matter.

From a tender age, instilled in me were the values of discipline, education, and contribution to society, a heritage passed down to me by my remarkable parents. Both of them laid the foundation for my own thirst for learning and service.

My mother, a trailblazer in her own right, due to lack of women's rights in Iran, defied the odds and entered in a university biology program, intending to continue to medicine. She was outnumbered by male applicants and was not given the opportunity. Instead, she switched her major and earned an accounting Masters degree. She held a position as 1st grade teacher, later

1 triumphing over social norms to achieve the pivotal position in Department of Education as a  
2 decision maker for Curriculum , Textbook Selection and Budgeting for schools.

3 After years of working as the international relations for Iran's Central Bank, my father was  
4 accepted to Harvard University JFK International Economics Masters program. My parents and  
5 my sister moved to U.S. for my dad to attend his program. I was born in Stoneham,  
6 Massachusetts and returned to Iran when I was 2 years old. Upon our return to Iran, we had a new  
7 religious regime. My dad's position at the bank was not needed as Iran did not have international  
8 relations at that time. He was given the job of starting universities to train students in building  
9 construction equipment and opening plants for manufacturing equipment as a result of U.S.  
10 sanctions on Iran. Iran was not able to buy this equipment from other countries.

11 Being an U.S. citizen in Iran exposed me to discrimination and even physical harm as a form  
12 of punishment during the turmoil of war in Iraq and amidst the U.S. sanctions on Iran. Despite  
13 my hardships, I discovered an unwavering determination to make a difference. My love for  
14 health care started when I insisted on joining my uncle as a first responder to help rescue trapped  
15 victims at bomb sites. As I assisted him, I witnessed the resilience of the human spirit in the face  
16 of adversity and immensely enjoyed reducing the chance of death or further injury. It was during  
17 these trying times that I found my calling within the healthcare field, ignited by the impact I  
18 could have in people's lives.

19 My fascination with dentistry began around the same time, at a young age around 8 or 9 years  
20 old, when I started enjoying my dental appointments. My dentist had a great attitude and the  
21 office was always lively and happy. I began to ask the names of the instruments he was using and  
22 would run after him in the office and try to pass him instruments like a dental assistant. He  
23 supported my curiosity and instilled in me the belief that I would be a great dentist. He even  
24 painted the picture that, after graduating, I could work with him. That became my motivation and  
25 thinking of that achievement was a form of meditation whenever I faced unbearable challenges.

26 As hatred increased against the U.S. citizens in Iran, abuse against me in school increased.  
27 My father, recognizing the growing danger to me and our family, orchestrated a remarkable  
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1 escape with the assistance of the U.S. Embassies in Austria and India. This daring feat insured  
2 our safety, and we found ourselves embarking on a new chapter in the United States.

3 My educational journey took a unique turn during my time at Albany Middle School. Upon  
4 taking my competency exam, I was placed one grade higher than my scheduled regular grade year  
5 based on my age. Experiencing jumping grades became my challenge to achieve at every level of  
6 my education. Transitioning to Albany High School, I embarked on an unconventional route to  
7 meet graduation requirements by taking summer school courses at Laney College in Oakland.  
8 This decision allowed me to transfer the credit and complete my high school requirements ahead  
9 of schedule. I was granted the opportunity to attend college during what would have been my  
10 senior year of high school.

11 I held various jobs during high school and university - working at a flower shop, taking night  
12 shifts at a gas station, and immersing myself in dental assistant and dental technician roles. These  
13 experiences not only reinforced my commitment to my education but also deepened my  
14 understanding of the desire to focus on becoming a Dentist.

15 Upon graduating from high school with educational credits from Laney College and Diablo  
16 Valley College, I set my sights on higher education at U.C. Davis. Acceptance into the biology  
17 and behavioral science program was an important milestone, and I began preparing to fulfill the  
18 requirements to pursue a career in dentistry.

19 Welcoming the challenges ahead, I embarked on the path of applying to dental schools. My  
20 dedication and hard work paid off as I undertook the demanding dental admission test (DAT) and  
21 achieved a remarkable placement in the top 95th percentile nationally. Complementing this  
22 achievement was an above-average GPA from U.C. Davis and a wealth of practical work  
23 experience, all of which solidified my application to multiple dental schools.

24 At the age of 20, I chose - from the many dental programs to which I was accepted - to attend  
25 a program at Nova Southeastern University, College of Dental Medicine in Ft. Lauderdale  
26 Florida, It just had built the new state of the art facility and the tuition was lower than other  
27 programs on my list. This marked a significant achievement, as I became the youngest student in  
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1 the history of the school at that time. My dental education continued to be marked by a relentless  
2 pursuit of excellence.

3 Progressing through the curriculum, I completed graduation requirements in my junior year,  
4 which provided me with a unique opportunity. I delved into specialty programs, honing my skills  
5 and earning certifications. Notably, I pursued a focus on dental implants, an area that resonated  
6 deeply with me as it involved more complexity than general dentistry, requiring understanding of  
7 physics and engineering a full arch reconstruction to make the most impact on patient's quality of  
8 life.

9 Being allowed to be involved in these cases that started making dental Implant Therapy  
10 popular was thrilling. I was even given a challenge to co-author an article with my professor. If it  
11 turned out to be worthy of publication, I would be allowed to qualify for Fellowship in Implant  
12 Surgery in my Senior year. As it turned out, I was able to publish the article which was titled  
13 "Evolution of Implant Therapy."  
14

15 Setting a precedent in the school's history, I became the first student to earn a prestigious  
16 fellowship in implantology, prior to graduating dental school. This accomplishment further  
17 solidified my expertise and enhanced my commitment to make a tangible impact in the field of  
18 dentistry and the community that I would serve.

19 After graduating from Nova Southeastern University College of Dental Medicine, my path  
20 diverged from the norm. While many of my classmates sought high-end, cash-paying patient  
21 populations, I was resolute in my mission to serve communities that were underserved. This  
22 choice was deeply personal, driven by the understanding of the challenges faced by individuals  
23 with government and HMO plans—challenges that my family had encountered firsthand.

24 My mother's own struggle to access timely dental care due to the limitations of doctors  
25 accepting these plans fueled my passion to create a change. With this resolve, I embarked on a  
26 journey to provide quality dental care to communities that had been overlooked for too long. I  
27 began working in clinics that catered to these populations, where government and HMO plans  
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1 were the lifeline for those who couldn't afford private insurance.

2 Through collaboration with Government Plans, DentiCal and HMO representatives, I became  
3 a dedicated provider in areas that were severely lacking dental professionals willing to serve  
4 these patients. This success was a testament to my commitment to the underserved and my ability  
5 to navigate complex systems to create positive change.

6 However, this journey was not without its challenges and detractors. Doctors who were  
7 against accepting these plans, started different approaches for me to regret my decision and move  
8 out of their areas. Calling me "money hungry," raising questions about my motives publicly, and  
9 trying to legally to push me out of their areas. The reality was far from the picture they painted.  
10 The reimbursements from these plans were substantially lower - often by 85% for basic and  
11 major treatments in comparison to private plans. Amidst the accusations and skepticism, I  
12 persevered. I faced staffing challenges due to tight margins, and I navigated a complex landscape  
13 where accusations of fraudulent activity were wrongly attached to me.

14 These accusations were thoroughly investigated, and it became evident that they were  
15 isolated incidents that had already been corrected or were swiftly corrected upon discovery.  
16 There was no intent to cause harm; rather, there was an unwavering commitment to delivering  
17 quality care to those in need.

18 The challenges I faced only fueled my determination to improve and excel. I was directed to  
19 take courses to enhance record-keeping and employee management, ensuring that the care I  
20 provided remained ethical, transparent, and aligned with my principles. Through it all, I stood  
21 firm in my dedication to the underserved, demonstrating a character that was defined by integrity,  
22 compassion, and an unyielding pursuit of creating positive change.

23 Most of the recognitions worth mentioning as a testament to my character were earned by  
24 studying. However, recognition by international honorary organizations are the most significant  
25 recognitions in the dental field; particularly the Fellowship of the International College of  
26 Dentists. This distinction holds profound meaning as it is extended through invitation only. To be  
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1 considered, a dentist is chosen without his knowledge and the dentist's character undergoes a  
2 rigorous, peer-reviewed evaluation that delves into their professional achievements, service  
3 record, and dedication to advancing dentistry for the betterment of humanity. To be recognized  
4 and invited to be a Fellow signifies that an individual has not only demonstrated exceptional  
5 professional prowess, but has also upheld the highest standards of ethics and integrity.

6 Another recognition that I believe to be extraordinary, was when I was nominated as a  
7 "World Leader in Implant Dentistry." This nomination was as a distinguished member of  
8 Ambassador Circle of International Congress of Oral Implantologists - the only education  
9 certification program recognized internationally. I'm among only 11 doctors nominated in the  
10 United States as dedicated educators in the field of Implant Dentistry chosen to help advance and  
11 promote education in implant dentistry.

12 Following my international recognitions and the esteemed positions, I was able to approach  
13 the world renowned author of the most published, and translated, text books in dentistry Dr. Carl  
14 Misch. I believed Dr. Misch would understand my vision and hope to see the current problems in  
15 dentistry and solutions needed for dentistry. I built up the courage to approach Dr. Misch after a  
16 lecture he gave and asked for a few minutes of his time during lunch. I presented my innovative  
17 idea on simplifying patient-specific classification and introducing dental risk classification for  
18 diagnosis and treatment selection.

19 Leveraging existing research alongside the result of my proposed research, I aimed to  
20 recommend the highest success options based on research, evidence based decision tree charts,  
21 and followed by training machines to recognize conditions using the same criteria for diagnosis  
22 and treatment planning. A big problem in dentistry is the lack of dentists and the busy schedule  
23 most keep that affects diagnosis accuracy. Two research publications have stated that there is a  
24 factor of between 49% and 53% misdiagnoses by dentists.

25 When Dr. Misch expressed enthusiasm for my idea, it marked a pivotal moment for me - one  
26 that ignited a collaboration that would lead to groundbreaking advancements. Driven by our  
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1 shared vision, we embarked on a research journey to redefine dental risk classification. Our work  
2 resulted in the introduction of the term "Dental Risk Classification" into dental literature - an  
3 achievement that resonated deeply with the field and underscored the transformative impact of  
4 our collaboration.

5 The passing of Dr. Carl Misch in 2017 was a profound loss for dentistry and for me  
6 personally. However, his legacy lived on through the seeds we had sown. While working  
7 full-time, I continued to delve into innovation in my off work hours. This dedication led me to  
8 conceptualize an Artificial Intelligence-aided diagnostic and treatment planning system which  
9 leverages dental imagery and data. With determination and unwavering commitment, over the  
10 years, I wrote down invention details and pathways for patent—an endeavor that would  
11 culminate in a groundbreaking achievement. However, I did not have courage , time, or know-  
12 how to file for patent at that time.

13 Before I could move forward with my system, my life journey took a major turn. The  
14 symptoms associated with my disability started surfacing in 2019. I started losing control of  
15 myself mentally and physically which led to my current charges.

16 To be precise, in early 2019, I started noticing weakness and stiffness in the muscles in my  
17 neck and shoulders. This led to frequent headaches which affected my ability to get a good night  
18 sleep. My attitude became grumpy and short tempered. By mid 2019, I started feeling pain more  
19 frequently and by August it had become chronic. I noticed it was worse during performing  
20 dentistry, hence I had to make changes such as adding more assistants during procedures,  
21 performing procedures in multiple visits, and taking more frequent breaks to stretch in the middle  
22 of procedures.

23 While performing a surgery on patient, I felt a sudden weakness on the right side of my neck,  
24 shoulder, tricep, wrist and thumb as I was rotating my wrist using an instrument to elevate the  
25 tooth. I realized I could not feel the tooth movement while pressing between tooth and bone. I  
26 had suddenly lost tactile sensitivity. I felt a burst in my neck that sent heat radiating, stabbing,  
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1 pain almost to all my extremities but very profoundly on my right side from neck to shoulder all  
2 the way to my fingers. It felt like someone poured boiling hot oil on my neck. The sensation of  
3 heat and pain was bilateral to my head, neck, shoulders, back, back of my legs to my calf muscle,  
4 chest, and arms. Literally, my entire body.

5 I stopped and dismissed the patient. Embarrassed, confused, and in pain, I got out of the  
6 office as soon as I could and went home to lay down on my back. I could not think straight. I did  
7 not make a decision to go to urgent care until a week later when my hygienist convinced me to  
8 go.

9 I was placed on full home rest for 2-3 months. After no improvement in pain management,  
10 Dr. Moody referred me to specialists Dr. Sponzilli and Dr. Su. Upon taking an MRI they found 5  
11 of my cervical discs from C2 to C7 had ruptured and herniated. I was determined to have  
12 stenosis, bone spurs, Cervicogenic headaches, occipital neuralgia, chronic neck pain, limiting  
13 motion, perceptual ability. All of these conditions affected my fine hand movement and the ability  
14 to engage in complex thinking.

15 Living with debilitating pain from chronic headaches, stiff neck, weakness in my shoulder  
16 and arms, numbness and pain in fingers, was almost impossible. The blurry vision, the inability  
17 to handle complex thinking, and the inability to control and sense fine movement made me a  
18 shell of the man I was.

19 Being unable to practice dentistry - what I loved the most in life - caused so much emotional  
20 pain and suffering that I was forced to stop practicing. I was later diagnosed with deep  
21 depression. I was not myself anymore. I had lost my identity. ~~I lost my identity.~~

22 ~~I lost my identity.~~  
23 Alongside my disability, in early 2019, a realtor introduced me to a contractor - co-defendant  
24 Kevin Ramirez - for my dad's house repairs. Ramirez was an employee of a construction  
25 company who worked at his main job from 6 am to 1pm, but would come and work at my dad's  
26 house afterwards.



1 After a few weeks, Ramirez told me he suffered a back injury at the construction company he  
2 worked for and was placed on paid medical leave. I shared with him that I was suffering from  
3 pain as well. He suggested cocaine as it worked well for him. ~~He suggested cocaine as it worked well for him.~~  
4 Desperate to deal with my chronic pain and depression, I regretfully made an out of character  
5 decision to accept his offer. Use of the drug made me lose more self respect. My state of mind  
6 was affected by my disability and medications, and by a blossoming addiction to cocaine.  
7

8 Ramirez continued complaining about his pain and began asking me for pain medication  
9 prescriptions in March of 2019. I asked him why didn't his doctor write him prescriptions for  
10 pain. He said his doctor for his disability claim was a chiropractor and couldn't prescribe  
11 medications. Additionally, Ramirez told me he could not afford insurance to go to an M.D.

12 I was resistant to write prescriptions for him at first. He noticed my resistance and waited  
13 until I was deep into my pain and when my addiction to cocaine he was supplying me was raging.  
14 Then, on or about October 2019, he started complaining that he had tooth pain, not just back  
15 pain. I insisted that he go in to take x rays, but he kept on missing his appointments.

16 Always desperate to help people, I decided to do a visual examination at my house and I  
17 noticed a dark cavity on the tooth he was complaining of. In my state of mind at that time,  
18 affected by debilitating pain, a lost identity and a severe addiction, I made a decision to write him  
19 prescriptions for pain. After a few prescriptions, pharmacies started refusing to fill the  
20 prescriptions for him. Ramirez suggested that I write them under his family members' names to  
21 fill the prescriptions and they would give the medications to him. I regretfully thought that was  
22 the best option at that time.

23 After a few prescriptions to his cousin Ramon De laTorre-Ramos, pharmacies started  
24 refusing to fill the prescriptions again. I started thinking maybe the refusals were age- related and  
25 I asked Ramirez to give me his parents' names to write. However, I faced the same refusals from  
26 pharmacies. Angry and clueless that my actions were illegal, I called the DEA 2 or 3 times to ask  
27 about what the problem could be. I also filed complaints against the pharmacists that refused to  
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1 fill these prescriptions. The period for these prescriptions was from Nov 2019- Oct 2020.  
2 According to my attorney's calculations, there was a total of 9 prescriptions for Norco and 10  
3 prescriptions for codeine syrup that were dispensed.  
4

5 Since my arrest in this case, I have been in treatment with therapists as part of my pretrial  
6 release. At this time, I'm focused on my ongoing treatments - physical and emotional - with the  
7 hope to be able to at least one day manage my pain to a constant 5/10 and to reclaim the  
8 emotional stability I used to have. I recognize that I will never be without physical pain or  
9 without the emotional shame of what I've done. However, the indomitable spirit I used to have is  
10 slowly coming back and I hope to limit my shame and bring back the pride in my  
11 accomplishments that I used to have.

12 It's my understanding, through therapy, that my prescribing controlled substances to my  
13 co-defendant and his family was a product of my medical condition and my cocaine addiction.  
14 They dulled my senses and caused me to see the world in a far different light than I do now.  
15 When my co-defendants requested that I write prescriptions for them, I should have refused. I  
16 have learned, and should have known, that my actions were illegal. Nevertheless, I think it is  
17 clear that this was isolated to one patient Kevin Ramirez and the family prescriptions were  
18 intended to reach him alone. I had no intentions to write prescriptions for anyone else's benefit in  
19 this fashion - I never did before and never will again.

20 I am certainly sorry for my actions. Not simply because I got arrested and charged, but  
21 because I now understand that my co-defendants may have been distributing the controlled  
22 substances I prescribed for them to other people. As an addict myself, I can appreciate the danger  
23 that their distribution may have caused the community.

24 I have learned to embrace my disability and see it as a gift, rather than a source of  
25 embarrassment and shame. During my journey of therapy and recovery, I gained valuable insight  
26 into coping with my disability by recalling my sister's strength in battling cancer twice and her  
27 unwavering determination not to surrender has served as an inspiration. With this new  
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1 understanding of my new self and education gained during this turn of events I have regained my  
2 drive and discipline to serve society with an improved version of me.

3 I look forward to benefitting further from whatever treatment options the Probation Office  
4 has for me. I will dedicate my remaining years to increase awareness of, and build a support  
5 group for, dentists who also face life changing disabilities. I want to help them reduce the  
6 damage to their mental health caused by conditions associated with this experience.

7 Most importantly, I have been able to secure a patent on the subject of Artificial Intelligence  
8 that Dr. Misch and I envisioned which will contribute to diagnostic capabilities by using digital  
9 3D scan cameras and other forms of diagnostic imaging. Once up and running, my invention will  
10 help providers give access for care in any part of the world, specifically underserved areas. This  
11 will improve the accuracy of diagnostics and reduce dentists' physical strain for diagnostic needs.  
12 I envision it being followed by robotics for simple procedures which will further reduce incidents  
13 of physical disability in dentistry while increasing access and reducing cost.

14 My character, as evaluated through my relationships and contributions, stands as a testament  
15 to my commitment to bettering society. Throughout my life, I have exhibited selfless acts,  
16 dedication to underserved communities, and perseverance through adversities. I have been  
17 recognized for my contributions to the field of dentistry, as well as for my educational and  
18 community work. These achievements are reflective of my true character, which has been  
19 momentarily overshadowed by the circumstances surrounding my felony charge.

20 During the time actions, I was not in my right state of mind due to the combination of chronic  
21 pain, depression, prescription medications, and the grip of cocaine addiction. My subsequent  
22 understanding of the texts exchanged during that period reveals that I was manipulated and  
23 coerced by individuals who took advantage of my vulnerability. They also instilled fear in me by  
24 frequently coming to my house and showing guns they were selling. I lost sight of my true  
25 identity and became enslaved by my addiction. I hope the court can recognize my character  
26 through my actions of 42 years and take into consideration that I did not have a choice in  
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1 acquiring my disability. I also hope that my disability doesn't ultimately become the defining  
2 aspect of my identity.

3 I am profoundly grateful for your time and consideration of my case. I humbly request that  
4 you take into account the exceptional circumstances I have outlined and allow me the opportunity  
5 to demonstrate my commitment to rehabilitation, personal growth, and positive contributions to  
6 society. I am ready to accept responsibility for my actions and continue working towards  
7 becoming the person I strive to be.  
8

9  
10 DATED: October 16, 2023

*Alireza Moheb*  
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ALIREZA MOHEB